

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Albert Russo
CN 4853
Trenton, NJ 08650
(609) 587-6888
Standing Chapter 13 Trustee

In re:

Frances M. Taylor
Robert Z Taylor

Debtor(s)

Case No. 18-25876 / KCF

Hearing Date: November 28, 2018 10:00 am

Judge: Kathryn C. Ferguson

Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

- 1) Must provide a copy of TD Bank Savings account for current quarter of 2018. 2)
Need copy of auto insurance renewal.**

The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s): Income verifies higher on Schedule I. Net income is \$1,042.80. Plan length may be shortened.

The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is \$2000 equity in 2011 Ford F150 and \$1000 equity in 2000 Subaru and \$15,571.06 in TD Bank Savings Account. Plan must remain 100%.

- 1) Must amend the Disclosure Statement to pay fees through the plan.**
- 2) Must resolve estimated IRS priority and unsecured claims**

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Mary Krieger, Staff Attorney